

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

DISABLED PATRIOTS OF AMERICA, INC., ) Case No.: 1:07-cv-06362  
 a Florida Not-For-Profit Corporation, and BONNIE )  
 KRAMER, Individually, ) Joan H. Lefkow  
 Plaintiffs, )  
 v. )  
 )  
 TOWN & COUNTRY CHICAGO ASSOCIATES, )  
 LLC, A Foreign Limited Liability Company, )  
 Defendant. )

**NOTICE OF MOTION**

To:

Thomas B. Bacon, Esq.  
 Attorney-At-Law  
 1515 Grant Street  
 Hollywood, FL 33020  
[baconlaw@bellsouth.net](mailto:baconlaw@bellsouth.net)

Jonathan E. Lerner, Esq.  
 P.O. Box 694  
 Wilmette, IL 60091  
 (Via U.S. Mail)

PLEASE TAKE NOTICE that on **Thursday, March 20, 2008 at 9:30 am.**, or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge Lefkow in Room 1925 or the courtroom usually occupied by her in the United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, or before such other judge of the United States District Court for the Northern District of Illinois Eastern Division, as may be sitting in her place and stead, and will then and there present the following **DEFENDANT'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT PURSUANT TO RULE 11**, a copy of which is attached hereby served upon you.

Respectfully submitted,

/s/ Michael I. Leonard  
 One of the attorneys for Defendant

Michael I. Leonard  
 MECKLER BULGER & TILSON LLP  
 123 North Wacker Drive, Suite 1800  
 Chicago, Illinois 60606  
 312-474-7925 (phone); 312-474-7898 (fax)

**CERTIFICATE OF SERVICE**

I, Michael Leonard, an attorney, certify that on March 6, 2008, the above-referenced documents were filed electronically with the Clerk of the Court using the ECF system. A copy of the above-mentioned will be sent automatically to Thomas Bacon and a copy will be sent via U.S. mail to Jonathan E. Lerner.

/s/ Michael I. Leonard  
 Michael I. Leonard